DEPARTMENT OF THE HEALTH AND HUMAN SERVICES
Public Health Service
Indian Health Service
Rockville, Maryland 20857 Refer to: OAM/DSM

# INDIAN HEALTH SERVICE CIRCULAR NO. 95-l

## IHS WAREHOUSE SAFETY PROGRAM

Sec.



1. Purpose. This circular establishes Indian Health Service (IHS) policy, procedures, and assigns responsibility to ensure the safety of all IHS warehouse employees.

2. Authority.

   A. Code of Federal Regulations (CFR), Title 29, 1910 and 1960.

   B. Hazard Communication Standard, 29 CFR 1910.1200 September 23, 1987, as amended and IHS Circular 94-2, entitled "Hazard Communication Program."

   C. Indian Health Manual (IHM), Part 5, Chapter 6, entitled "Supply Management."


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D. Indian Health Manual,.Part 1, Chapter 8, entitled "Managing the Workers Compensation Program," and Chapter 9, entitled "Occupational Safety and Health Program."

3. p o 1 i c y .is the policy of the IHS to ensure a safe and healthy work environment for all its employees, patients, contractors, and visitors in an effort to prevent personal injuries, illnesses, and accidents.

4. Backsround. Congress passed the Occupational Safety and Health Act and established the Occupational Safety and Health Administration (OSHA) to mandate safety and health. standards for particular industries, trades, crafts, occupations, businesses, and work environments. The IHS is required to comply with all OSHA requirements and provide Federal employees with a safe and healthy work environment. It is also required that each workplace have a safety program, undergo annual safety inspections and correct all serious safety and health conditions. Hazard Communication Standard (HCS) requires employers to establish hazard communication programs, to transmit information on hazards of chemicals to their employees by means of labels on containers, Material Safety Data Sheets (MSDS), and training programs. The expansion of the IHS supply program to a Division of Supply Management (DSM) with responsibility for the implementation of Regional Supply Service Centers (RSSC) and the transfer of the Public Health Service Supply Service Center (PHS SSC) at Perry Point, Maryland to DSM has created the need for an IHS warehouse safety policy.

5. Applicability. The circular is applicable to all IHS supply warehouses, operations, and activities. The program will " apply to all permanent and temporary, full-time and part-time employees, tribal personnel, volunteers, trainees, visitors, and contractors.

6. Objective. The objectives of the IHS warehouse safety program are to:

A. Provide a safe working environment for IHS employees and visitors to warehouse facilities.

B. Provide information to all customers on hazardous materials stocked in the warehouse.

C. Ensure that the building, equipment; and products do not create safety hazards for employees and visitors.

D. Provide all employees with effective instructions on working safely; responding to injury, disaster,. and dangerous situations; and complying with all applicable State and Federal safety regulations.

E. Create a system for ensuring that all employees understand and follow IHS safety rules and procedures.

F. Make adequate equipment available to protect employees from injury.

G. Reinforce the system for reporting safety problems including accidents and injuries.

7. EMPLOYEE SAFETY ORIENTATION.

A. Objective. The objectives are to foster safety awareness and practices among employees and to provide a safe and healthy work environment. Safety orientation shall include policies and procedures for:

(1) Reporting and processing reports of work related injuries and/or occupational diseases.

(2) Work place evacuation procedures and various routes for employees and visitors.

(3) Disaster and emergency responses.

(4) Safety inspection.

(5) Safe practices.

16) Keeping equipment in safe working condition.

(7) Maintaining good housekeeping in the work areas.

(8) Awareness of incident-producing situations.

(9) Reporting all potential injury hazards to the supervisor.

(10) Providing a safety training program.

B. Documentation. Orientation will be documented and made part of the employee file.

8. SAFETY COMMITEE.

A. Objective. The objectives of the safety committee are to:

(1) Provide a vehicle to develop and monitor the safety program.

(2) Contribute to a more efficient operation by helping to reduce accident frequency and severity.

(3) Ensure the warehouse is in compliance with OSHA standards;

(4) Increase employee safety awareness and general morale by facilitating communication and cooperation between management and workers.

(5) Conduct safety inspections and review inspections performed by fire marshalls and safety officers.

(6) Review internal and external disaster plans and drill reports.

(7) Review procedures for inspection, reporting of accidents and developing educational programs.

(8) Recommend corrective action for problems identified and followup with review of effectiveness of these actions.

B. Tasks. Responsibilities encompass four primary tasks.

(1) Developmental Tasks.

a. Establish safety goals and objectives.

b. Develop safety policies to cover any unique situation.

C. Promote safety and recognize employees who demonstrate safe work habits (recognition via awards system(s), e.g., certificate, letter of appreciation, or cash prizes, etc.).

d. Enhance the success of the safety committee through the following:

(i) Top Management Support. This establishes credibility and authority in the eyes of all warehouse and supply employees.

(ii) Widespread Involvement. Encourage employees from each shift/crew, department, management, and the union to participate.

(iii) Demonstration of Results. Reduction of accidents will help to maintain employees cooperation and enhance the committee's credibility.

(iv) Documentation. Written records are required by law for many safety-related issues. They also help to monitor the progress of the safety program and identify new risks and hazards.

(2) Educational Tasks. Training programs may be conducted by an in-house specialist, an outside consultant, or an equipment manufacturer representative. The safety committee shall monitor the frequency with which training programs are provided, and make recommendations for increased training or additional topics as needed. Training will include the proper procedure for:

a. Operation of warehouse equipment.

b. Proper handling and lifting of supplies.

C. Use of personal protective equipment.

d. Emergency response to a disaster or an accident.

e. Safe work practices; such as compressed gas, fire and disaster safety, forklift safety, stocking and handling hazardous materials first aid, blood-borne pathogens, materials safety data sheets, utility outages, electrical safety, etc.

(3) Investigative Tasks. In addition to monitoring the use and application of safety procedures- and policies, the committee shall investigate injuries, property damage, and hazardous situations. (For further information see IHM Part 1, Chapter 9, entitled "Occupational Safety and Health Program," Section l-9.8, p.14.) These include:

a. All accidents to determine both the cause and the appropriate methods for prevention.

b. Any potential hazards (as determined by employee input or inspections) and implement.. accident-prevention measures where appropriate.

(4) Monitoring Tasks. Includes monitoring the following:

a. Conducting safety inspections.

NOTE: A Safety Committee Audit form for Self-inspection has been developed by DSM (See Exhibit 95-l-A).

b. Followup inspections, necessary to ensure that identified hazards and unsafe conditions have been corrected.

c. Ensuring safety records are maintained including accident reports, training records and other safety data.

c. Structure.

(1) The committee shall be chaired by the deputy director at RSSC, or appropriate supervisor at the service unit warehouse. The chairperson will oversee all aspects of the committee organization and be responsible for providing a safety program.

(2) It is recommended that the safety committee be composed of: a member from each management section, a union representative, and a member from each warehouse shift/crew and section.

D. Committee Meetings.

(1) The committee shall preferably, meet monthly, but no less than quarterly.

(2) Topics. The committee shall discuss safety and develop action-specific--plans regarding warehouse safety policies.

Periodically a general staff meeting shall be held to inform employees of committee findings, and promote safety.

a. Suggested committee meetings topics are:

(i) Safety statistics *review.*

(ii) Safety objectives/policies.

(iii) Training courses.

(iv) Government regulations.

(V) Safety inspection.

(VI) Critique of emergency drills.

(vii) Review of accident investigations.

(viii) Plan for safety incentive programs.

(ix) Maintenance of safety records, including accident reports, training records, and other safety data.

b. Suggested topics for the staff meetings are:

(i) Instructions on a specific hazard.

(ii) Announcements/explanation *or* incentive programs.

(iii) Review of safety goals/policies.

(iv) Current safety statistics.

(v) Recognition of safety program achievements.

9. SCOPE OF RESPONSIBILITY.

A. Objective. The objectives are to protect employees, visitors, and property, and to ensure all phases of the safety program are implemented within the jurisdiction of the warehouse operation.

B. Safety Officer. The warehouse safety officer is responsible for:

(1) Working closely with the warehouse program director and appropriate personnel.

(2) Being the liaison person between the safety committee and the respective program managers.

(3) Providing direction for the safety management program.

(4) Providing technical assistance in investigating and reporting accidents and injuries.

(5) Following-up on the reported deficiencies and accidents and ensuring that proposed corrective measures have been submitted to the proper authority.

(6) Providing results of investigations to appropriate administrative personnel and/or IHS Claims Officer, when required.

(7) Ensuring safety training is provided to warehouse and supply personnel and such training is documented.

(8) Maintaining qualifications through training and continuing education.

10. MATERIAL HANDLING.

A. Objective. To promote the proper techniques for lifting, moving, and stacking materials within the warehouse, and to ensure the use of protective clothing, equipment, and procedures in handling hazardous materials. Employees shall:

(1) Review the goals and requirements of the HCS. See IHS Circular 94-2, entitled "Hazard Communication Program."

(2) Serve as information resource regarding HCS for employees and users.

(3) Review the hazardous chemicals in the work place and initiate preventative measure to minimize hazards.

(4) Receive training on working safely with these materials.

(5) Implement preventive measures by reviewing the safe limits for lifting established by the National Institute for Occupational Safety and Health, PUB. NW, 94-110, available from the National Technical Information Service, (703)487-4650, Springfield, Virginia, stock number PB94-176910LJM:

a. Wearing the appropriate personal protective apparel, when required for materials handling.

b. Using the required safety equipment.

C. Ensuring storage container are used for hazardous chemicals.

d. Storing hazardous chemicals in the designated storage area.

e. Using proper lifting and storing techniques.

f. Maintaining daily housekeeping.

B. Safety Procedures.

(1) Injury. In a non-emergency situation notify your supervisor immediately and get prompt medical treatment. For an emergency situation get prompt medical treatment then notify your supervisor. For further information on policy and procedures for injuries see the IHM Part 1, Chapter 8, entitled . "Managing the Workers Compensation Program" Section i-8.3, p.5.

(2) Back. Wearing Lumbar Support Belt, lifting with the strength of the legs and with the back straight, prevents back injuries.

(3) Storage and Consumption of Food and Beverage by Employees at Work Place.

a. Food and beverages will not be stored in the same refrigerator, ice machine, freezer, cabinet, or immediate work area, with toxic chemicals, biological specimens, or other materials which may cause illness or injury in the event of contamination or mistaken **identity.**

b. Food and beverages shall not be prepared nor consumed in areas where biological specimens are handled, where harmful contamination or mistaken identity may occur; nor where toxic, radioactive, or pathogenic materials are handled, stored or processed.

(4) Temporary Storage of Equipment and Supplies.

a. Whenever possible, all crating and packaging materials will be removed before items are moved into a building. 1f not possible, all accessories will be removed promptly following unpacking.

b. Whenever possible, supplies and equipment shall be placed in their proper location.

c. As the warehouse staff unloads combustible furniture and equipment, packaging materials shall be immediately removed from heavy traffic areas and any area within the medical center or health facility.

C. Emergency Water Requirement.

(1) Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

(2) Emergency water for small chemical splashes. Liquid may burn, irritate, or otherwise be harmful to the skin if splashed on the worker's body, so there shall be a supply of clean cold water.

(3) A water supply of at least 15 minutes duration shall be available for flushing chemicals from the eyes.

D. Emergency Safety Equipment.

(1) The automatic fire extinguisher and fire detection systems shall be connected to the facility fire alarm system so that an alarm is sounded as soon as a fire is detected. Quarterly drills are required.

(2) Suitable fire extinguisher for particular hazards shall be accessibly located for ready use. Annual fire extinguisher training is required.

(3) Emergency Showerequipment. The standard for shower heads is 208-244 cm (82-96 inches) above the floor with a spray pattern centered at least 41 cm (16 inches) from any obstruction and 51 cm (20 inches) in diameter at a height of 152 cm (60 inches) above the floor.

a. The valve actuator shall be easily located and accessible, with a handle not more than 175 cm (69 inches) above the standing level and with a control valve that remains on without the operator holding on in the *on* position.

b. Emergency showers shall be accessible within 10 seconds and shall be within a travel distant no greater than 3,000 m (100 feet) from the hazard.

c. Showers shall be capable of delivering a minimum of 114 liters (3.0 gallons) per minute of water and shall be connected to a 2.5 cm (1 inch) Iron Pipe Size minimum water supply.

E. Eyewash Equipment (Self-Contained). The standard specifies that a controlled flow of potable water or its equivalent shall simultaneously provide water to both eyes at a low velocity so as not to injure the patient.

(1) The eyewash control valve shall be simple to operate and able to be turned on in one second or less. It should be designed so that the water flow remains on without requiring the use of the operator's hands and should be tested each week.

(2) The standard for location of emergency eyewash units is the same as the emergency showers, within 10 seconds and 3,000 m (TOO feet).

F. Hazardous Materials.

(1) Hazardous materials shall be separated from other supplies and stored in a separate location within the warehouse.' The location must meet specific OSHA requirements for the storage of these items.

(2) Photographic Fixer Solution. The Environmental Protection Agency has identified photographic fixer solution (hypo solution) with more than 5 parts per million silver present to be a hazard. Supply personnel shall practice caution when handling this item.

(3) Mercury.

a. Mercury and mercury compounds are hazardous and must be handled, stored, and or recycled disposed of with caution.

b. Mercury is found in thermometers, manometers, long-life batteries, and fluorescent light tubes.

c. Expired fluorescent light tubes (depending on State regulations and the type of lamp), unusable thermometers, and mercury batteries. are hazardous waste, therefore recycling facilities use for proper reclamation is required. (See your warehouse safety officer for current regulations.)

d. Manometer spillage and all other solid mercury spillage must be cleaned Up;

A special filtered vacuum cleaner, that will safely collect the mercury or mercury compound, should be used for cleanup, or a special kit made for this purpose can be used by trained, designated personnel.

e. Mercury or mercury compounds will be collected and submitted for recycling for non-facility disposal by the sole reclaimer, J.F. Jelenko & Company, 99 Business Park Drive, Armonk, New York; shipping containers are available cost free by calling Customer Service l-800-431-1785. The company requires all amalgam be disinfected by soaking in a dilute bleach and water solution (between l/10 and l/100) for 10 minutes.

(4) Chemotherapy Drugs.

a. Cartons will be marked from the outside identifying them as hazardous materials/ chemotherapy drugs.

(i) Upon receipt, packages will be visually inspected. If there does not appear to be any damage to the package, it can be stocked and/or taken to the pharmacy.

(ii) If the package appears to be damaged, it should not be handled. The warehouse director and a pharmacist should be contacted immediately.

(iii) If the package is definitely leaking or damaged, do not move it. Clear the area and contact the warehouse director/pharmacist and other appropriate officials as required.

(iv) Chemical spill Cleanup - immediately contact the area RSSC Warehouse Director or Pharmacist for assistance concerning chemical spill cleanup. The MSDS lists emergency handling and first aid procedures.

.(5) +Labels. The hazardous warning label is often the first source of information about chemical hazards. The name and identity on the label can be used to find the right MSDS, where additional information can be found. Employees are required to learn the use of hazard warning labels which includes:

a. The name and identity of the chemical.

b. The chemical6 that are exempted from the OSHA labeling requirement.

c. Hazard Chemical Inventory.

(i) The inventory must maintain a list of all hazardous chemical materials currently in the work place.

(ii) Containers of materials on the hazardous chemical inventory must be labeled, tagged , or marked with a placard.

(iii) The MSDS must be available in warehouse for all chemical items in inventory.

d. Hazardous chemicals within the work place and/or leaving the work place are to be labelled with:

(i) Identity of the hazardous chemical.

(ii) Appropriate hazard warning to ensure employee protection.

(iii) Name and address of the manufacturer.

e. The warehouse may use signs, placards, process sheets,, batch tickets, operating procedures or other written material in the place of a label on stationary process containers.

f. Labels on incoming containers are not to be destroyed, removed, *or* defaced, unless immediately replaced with another label containing the required information. If the existing label complies with this section, there is no need to relabel the container.

(6) MSDS. Information and training shall be provided for employees. Also, the warehouse is an important resource to up-date MSDS's to users; General Services Administrations (GSA) "Fast" MSDS Database System offers approximately 4,000 MSDS's stocked by GSA and may be transferred and copied for users hard disk or directly from the host computer to the user's FAX machine; for information call GSA, (404) 331-5855.

a. Contains information on the potential health hazard6 of a product, physical-chemical characteristics, fire and explosion hazard reactivity data, health hazard data, precaution for safe handling and use (spill cleanup procedures), and control measures, emergency information and telephone numbers.

b. Shall be provided by the manufacturer; however,' if a copy is not received, a copy should be obtained as soon as possible and distributed to the respective users. Should the manufacturer relate that there is no MSDS for a specific product, a letter to that effect should be requested. The MSDS are to be maintained in an organized file.

(7) Cvlinders.

a. Pressurized cylinders containing any gas or compressed air shall be capped and chained to a wall or wheeled cart during storage or transporting.

b. Cylinders shall never be carried by the neck adapter, threaded insert or valve, or be moved so that the neck is in danger of striking any

object.

C. The National Fire Protection Association - 99 entitled "Standard for Health Care Facilities; describes cylinder bulk storage requirements and The Compressed Gas Association, Pamphlet P-2, also discusses cylinder handling practices.

(8) Batteries (Auto. Other Vehicles, Supplies, and Equivalents).

a. Eye protection will be worn when cleaning the battery to prevent caustic deposits from entering the eyes.

b. Batteries emit highly explosive hydrogen gas. Store them away. from sources of heat or ignition.(e.g., bare light bulbs).

c. Special precaution will be taken when adding water to a non-maintenance free battery and when carrying a battery. The electrolyte (battery acid), even when diluted, is very corrosive and shall not be allowed to contact clothing or skin.

d. The battery ground (0) cable will be disconnected at the battery before working on the fuel or electrical system.

e. Overheated and frozen batteries could rupture allowing the electrolyte to escape into the work area or the environment.

f. Batteries shall not be left in a flashlight or other item producing high heat.

(9) Hazardous Gases, Vapors, and Fumes.

a. Certain gases, vapors, and fumes are highly toxic and can quickly cause unconsciousness and even death if inhaled. Gasoline vapor falls into this category, as do the vapors from some cleaning solvents.

b. Fuel powered engines should not be operated in an enclosed space, such as a garage or warehouse. Exhaust contains carbon monoxide, which is extremely poisonous.

(10) Precious Metal Recovery: Hypo Solution/Dental Amalgam.

a. Silver recovery canisters should be handled and stored with caution.

b. Radiographic (x-ray) and photographic film should be stored in a secure area where the temperature does not exceed 22 C (72 F) and the relative humidity is approximately 50 percent to prevent film deterioration.

c. The canisters and small containers of precious metals will be stored in a secure area in the warehouse until they are transported to disposal areas identified in the Department of Defense's Precious Metal Recovery Program under the authority of the Federal Property Management Regulations, 101-42.3.

d. The single claimer is J.F. Jelenko and Company, 99 Business Park Drive, Armonk, New York; shipping containers are available cost free by calling Customer Service, l-800-431-1785. The company requires that all amalgam be disinfected by soaking in a dilute bleach and water solution (between l/10 and l/100) for 10 minutes.

11. PERSONAL PROTECTION: EQUIPMENT AND REQUIREMENTS.

A. Objective. To reduce the potential risk of employee injury and property damage.

(1) The following is a list of protective clothing and equipment that should be made available to employees for protection against workplace hazards. All protective and safety gear must meet OSHA Standards.

a. Face masks, or respirators for emergency use approved by the National Institutes of Occupational Safety and Health as described in CFR 29 1910.134.

b. Safety goggles, safety spectacles, or face shields as warranted.

C. Protective head gear (hard hats and caps, liners, helmets, hoods).

d. Split leg aprons, suits, gloves (asbestos, leather, rubber, cotton, synthetic).

e. Conductive (steel toe) shoes.

f. Barricades, flags, scaffold, warning signs, alarm, lights, shields, and other public warning-devices.

g. Lumbar Support Belt.

h. Safety Belts.

(2) Care and Maintenance. The warehouse director shall establish a product safety program for maintenance, repair, protection, and proper use of the Government property.

a. It is the employee's responsibility to use and maintain assigned protective clothing, supplies, devices, and equipment in a sanitary and serviceable condition.

b. Supervisors will periodically spot check equipment and supplies to ensure these items are in operational condition.

C. As supplies becomes worn, they will be presented to the supervisor for replacement.

d. As safety equipment becomes worn or inoperable, it will be presented to the supervisor or custodial officer for replacement.

e. The use and maintenance of protective apparel and equipment must be a critical element in the employees Performance Management System ratings.

(3) Clothing.

a. Jump-suits and coveralls should be made of polyethylene-coated tyvek, because it is lightweight, easily stored, and an excellent protective apparel.

b. Additional supplies that may be used are: aprons, elastic wristbands, attached hoods, and boots.

(4) Protective Shoes.

a. A11 personnel engaged in handling or moving boxes, cartons, pallets, barrels, etc., will wear safety shoes or boots as a means of preventing or minimizing foot injuries.

b. The type of protective shoes required are shoes with steel toes and non-slip (neoprene) soles.

(5) Hard Hats. Prevention is the best cure. Plastic hard hats will be worn in areas where supplies are stored higher than five feet above the ground. Hard hat is worn for the protection from falling and flying objects and from limited electric shock and burn.

(6) Safety Belts. Safety belts will be worn when operating stock pickers and fork lifts if equipped with safety belts.

12. EMERGENCY RESPONSE TEAM AND PLAN.

A. Objective. To assign responsibilities to the Emergency Response Team (ERT) and other employees, and to provide procedures for implementation of a emergency response plan, regardless of the type of emergency or disaster.

B. The Warehouse Director is responsible for:

(1) Forming an ERT consisting of a team leader and team members. This team shall also serve as the fire response team.

An ERT Leader Shall:

a. Assess the situation and determine whether the emergency requires the activation of Emergency Response Plan (ERP).

b. Assign duty to each team member.

C. Direct the implementation of ERP, including the evacuation of personnel.

All ERT Members Shall:

a. Be knowledgeable of all basic emergency procedures and roles, so that if a team member is absent or injured, another team member can assume the role.

b. Be assigned one or more of the following duties:

(i) Shutdown procedures.

(ii) Employee accountability.

(iii) Security measures.

(iv) Other duties as required by the ERT Leader.

(2) The development of the ERR.

B. Types of Disasters. The following specific types of disasters pose the greatest threat to the warehouse.

(1) Man-Made.

a. Hazardous-material accident.

b. Fire.

(i) Elevators will not be used for emergency evacuation unless directed by the department or other emergency officials.

(ii) Windows should not be broken out since they help control fire from spreading and the glass falling creates serious exposure.

(iii) All doors and windows must be kept closed except to pass through in case of emergency.

C. Major gas and water breaks.

d. Terrorism.

e. Bomb threat should be considered as being valid. Immediately notify the warehouse director, the police, and bomb squad.

(i) When talking to the caller, an attempt should be made to obtain as much information as possible, including:

(a) Expected time of explosion.

(b) Location of bomb.

(c) Size and type of bomb.

(d) Reason bomb was placed.

(ii) If a bomb or suspicious device is found, the premises shall be evacuated in accordance with the guidelines established for fire emergencies.

An "All Clean announcement shall be given when authorized by the director.

(2) Natural.

a. Extreme cold.

b. Fire from lightning or spontaneous combustion.

c. Flood.

d. Earthquake.

e. Earth slide or mud slide.

f. Snow and ice.

g. High winds.

h. Hurricane.

i. Tornado.

(i) A tornado warning is an alert by the National Weather Service confirming a tornado sighting and location. The weather service will announce the approximate time of detection and direction of movement. The wind will be 75 miles per hour or greater.

(ii) Public warning will come over the radio or television. Tune to the radio/television or proceed with the instruction established by the local city civil defense warning system.

(iii) Action to take when located in a building:

(a) Move away from the perimeter of the building and exterior glass.

(b) Leave your office and close the door.

(c) Go to the stairway for shelter. Always walk calmly.

(d) Sit down on stairway and protect yourself by putting your head as close to your lap as possible, or kneel, protecting your head.

03 Do not go to the first floor lobby or outside the building.

(f) Remain in the stairway until the "All Clear" is issued.

(9) should you be required to remain in the office, seek protection under a desk.

j. Sand and dust storms.

c. WAREHOUSE EMERGENCY ORGANIZATION STRUCTURE: No person is expected to risk his/her life in the performance of his/her job. In the event that a life threatening condition develops,-a safety officer or designee is required to immediately terminate activities until the area or activity has been determined safe.

D. Emergencv Evacuation Procedures:

(I) Develop Warehouse Map. Floor plans or work area maps shall clearly show escape routes and be posted in key areas where employees can readily see them. The nearest shelter area or assembly areas should be indicated.

(2) Shutdown Procedures. Before evacuation, if reasonable, employees should turn off operating equipment such as fork lifts, computers, etc., and ensure all utilities are turned off.

(3) Employee Accountability. The ERT Leader shall designate someone for accountability of all employees after evacuation.

(4) Security Measures. A team member should be appointed to compile a list of security problems that can take place after a disaster, such as, looting of inventory, and accidents to onlookers and employees in unsafe areas. Security efforts should be coordinated with local community law enforcement personnel.

E. Emergency Training: A simulated emergency drill shall be conducted annually and include all personnel and local off-site emergency responders. Practice drills shall be held randomly, a minimum of four times annually, for each shift, to ensure that employees know where to report and what their duties are in an emergency. At least one on duty employee should be available who is trained in first aid and cardial pulmonary resusitation.

F. Local Off-Site Emergency Responders. The warehouse director shall provide responders with the following information.

(1) fire Department.

a. The location, construction, and arrangement of all buildings.

b. Accurate floor plans of each warehouse building.

c. The hazards such as flammable gases, liquids, and materials that are on-site.

d. The type and location of the on-site fire equipment.

e. Access routes in and around the warehouse.

(2) Police Department.

a. The location and arrangement of all warehouse buildings.

b. Accurate floor plans of each warehouse building.

C. Potential security problems.

(3) Ambulance Service.

a. The location and arrangement of all warehouse

buildings.

b. Access routes in and around the warehouse.

c. Hospital Locations.

(4) Fire Protection.

a. Fire safety will be accomplished through:

(i) Practicing the IHS no smoking policy.

(ii) Total evacuation of occupants from the.. building during fire alarm.

(iii) Development of operating and maintenance procedures for the warehouse building. These include:

(a) Provisions for detection, alarm, and extinguisher.

(b) Fire prevention, planning, training, and drills.

(c) Fire alarm testing, conducted four times annually. Unannounced drills shall also be exercised.

(d) During fire alarm testing, the safety officer may set off the alarm. Alarm testing must be coordinated with the local fire department and/or emergency responders.

b. The discovery or suspicion of a fire.

Anyone who discovers or suspects a fire must immediately activate the nearest fire alarm pull station.

C. Fire Alarm Building Code.

The annunciator panel is generally located in the lobby of the warehouse and is illuminated by a small light to show the exact location of the alarm source. Alarm pull boxes are located near exits or exit access from the building.

d. Local Fire Protection.

Every local fire department responds to all fire alarms. The designated fire lane shall be kept clear of any unauthorized vehicles at all times.

e. Fire Drill Procedures.

Employees and ERT response activities.

(i) Employees and visitors shall evacuate by following the diagram that identifies the nearest marked exit.

(ii) The ERT leader and team members shall implement and or revise an existing ERP immediately to ensure the safety of all visitors and employees. The ERP shall include:

(a) Ensure shutdown of utilities, machines, forklift, etc.

(b) Ensure evacuation of employees and visitors.

(c) Assist in controlling/extinguishing the fire. The fire extinguisher will be removed from storage, taken to the site of the fire and continuously manned.

(d) Ensure that the employees roster is, checked for accurate accountability.

(e) Ensure that all security measures are in place.

(f) Ensure local emergency responders have been contacted.

(g) Ensure all draft producing passages 'are closed.

(iii) Termination of a drill.

(a) The ERT leader will notify the switchboard operator when the fire drill is completed. The operator will then announce the termination of the drill.

(b) The ERT leader, team members, and administrators shall meet immediately after the drill to evaluate and critique the evacuation and response time.

13, INCIDENT REPORT AND FORES.

A. Objective. To record all incidents on the IHS Log of Federal Occupational Injuries and Illnesses form, and to report the incidents on a IHS-516, "Incident Report Form." (See IHM, Part 1, Chapter 8 and 9, for further instructions on *workers'* compensation, incident reporting, and forms.)

B. Responsibilities.

(1) Supervisor.

a. Ensuring that the incident report is completed and submitted through the appropriate administrative channels to the local IHS occupational safety and health officer.

b. Consulting with the local servicing personnel officer for additional guidance for submitting form CA-l, "Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay-Compensation, and form CA-2, "Notice of Occupational Disease and Claim for Compensation."

b. Ensuring that the employee(s) receive prompt medical treatment.

C. Ensuring that the employee(s) are aware of their Federal Employees Compensation Act (FECA) rights and responsibilities.

d. Ensuring that the circumstances related to an incident are investigated and will secure written statements from witnesses, if any.

e. Ensuring that the disclosure of the incident reporting records/forms and the information contained are subject to the Privacy Act of 1974 and the Freedom of Information Act procedures.

C. Definitions.

(1) Incident - **An** incident is any event or chain of events, which results in property damage, occupational disease, occupational illness, *or* injury to any person(s) or interrupts, interferes, or has the potential to interfere with the orderly progress of work, or for which a tort claim may be possible.

(2) Reportable incident - All incidents regardless of the cause, consequence, damage, or location shall be reported to the immediate supervisor or designee on duty. An Incident Report Form (IHS-516) must be completed and routed through administrative channels to the local IHS Occupational Safety and Health Officer.

(3) Recordable incident - All incidents (including death) will be recorded regardless of nature. All incidents must be recorded within 6 days of notification of the incident. The incidents must be recorded and coded for statistical evaluation purposes on the Incident Report Form (IHS-516).

Other recordable incidents include:

a. Damage of $500 or more to IHS owned, rented, or leased property and; to private property when it is on government or contracted property.

b. Damage in any amount by anybody to privately , owned property used on official business; or damage by IHS employees, while on official business, to any private property.

c. Any incident which may result in a tort claim. Incidents resulting in a tort claim are subject to the procedures outlined in the General Administration Manual, PHS Chapter 4-00, entitled "General Information Regarding Tort Claims," Chapter 4-30, entitled "Procedures Regarding Tort Claims," and Chapter 4-35, entitled "Military Personnel and Civilian Employees Claims."

(4) Occupational Injury - A wound or conditions of the body induced by accident or trauma, and includes a disease or illness proximately caused by the employment for which benefits are provided under

FECA. The term injury includes damage to or destruction of medical braces, artificial limbs, and other prosthetic devices which shall be replaced or repaired; except that eyeglasses or hearing aids shall not be replaced, repaired or otherwise compensated for, unless the damage or destructions is incident to a personal injury requiring medical services. For further information regarding benefits and procedures please see the IHM Part 1, Chapter 8 and 9.

(5) Occupational Disease or Illness - A condition produced in the work environment over a period longer than a single workday or shift by such factors as systemic infection; continued or repeated stress or strain; or exposure to hazardous elements such as, but not limited to, toxins, poisons, fumes, noise, particulates, radiation, or other continued or repeated conditions or factors of the work environment.

14. SAFETY INSPECTION.

A. Objective. To identify warehouse safety hazards and examine the effectiveness of the current safety policy.

D. preventive Maintenance Inspection. The warehouse safety officer is responsible for the inspection of equipment, supplies, systems, and devices; and testing in accordance with prescribed preventive maintenance standards which relate to safety, occupational health, and fire protection such as:

(1) Personal protective equipment.

(2) Hazardous materials use and storage.

(3) Warehouse evacuation plan.

(4) Illumination of exit signs.

(5) Fire extinguisher (date of inspection and initials of inspector on tag affixed to fire extinguisher).

(61 Combustible material storage.

(7) Materials handling equipment.

(8) Physical areas (conditions of walls, ceiling, floors, window, doors, lights, electrical outlets, etc.)

(9) Power tools.

(10) Motor vehicles.

(11) Extension cords, condition and appropriate use.

(12) Absence of tripping hazards, cords, carpet, paper clips, etc.

(13) Sanitation and industrial hygiene hazards.

(14) All cylinders to ensure they are securely supported in the vertical position.

(15) Aisles are clear for easy evacuation.

(16) Employees must know the warehouse fire policies as well as their section fire policies.

(17) Employees must know what they are to do in case of a fire.

(18) Examine and verify the effectiveness of current safety rules. Safety policies should be reviewed and revised as necessary, annually. Documentation of review should be maintained with administrative records.

C. Warehouse Self-Inspection. The following shows the organization of warehouse self-inspection.

(1) Work Place Inspections. The inspections will be performed as needed but no less than monthly. Corrective actions shall be initiated to rectify., any problems identified. Each inspection report will be certified by the signature of the section supervisor or designee.

a. An internal inspection is required. It may be performed by members of the supply committee, warehouse safety officer, or section supervisor as delegated by the warehouse director.

b. Other agencies that may conduct inspection/ review are the Area safety officer, Office of Environmental Health, DSM, and OSHA.

C. A self-inspection form has been developed by the DSM., It may be modified to include particular areas or functions peculiar to the warehouse. See Exhibit C for Warehouse Self-Inspection form.

15. FORK LIFT.

A. Objectives. The objectives are to ensure employees are following good safety practice in operating the fork lift (powered industrial truck) and to ensure the work area is kept free of hazards.

B. Fork Lift Operation.

(1) Only trained and authorized operators shall be permitted to operate a fork lift. See CFR 29 1910.178, Section L, Operator Training.

(2) Safety begins with Attitude.

(3) A seat belt should always be worn and it is the employee's responsibility to do so.

(4) The fork lift should be inspected daily.

(5) The load capacity should be known.The forks should not be overloaded. Load capacity shall be posted on the fork lift.

(6) The engine should be turned off before the widths of the forks are adjusted.

(7) Only stable or safely arranged loads shall be handled. Forks should be spaced to balance the load. Caution shall be exercised when handling off-center loads which cannot be centered.

(8) The fork lift route should be planned before use:

a. Sufficient overhead clearance should be ensured before operating under overhead installation, lights, pipes, etc.

b. The path should be clear, dry, and level.

C. The operator should avoid running over loose objects on the floor.

d. Extreme caution should be taken, if the fork lift is to be operated on wet and slippery floors.

e. If the load being carried obstructs the forward view, the lift shall be operated in 'reverse.

(9) Before loading pallets from above, the pallet should first be bypassed to get a clear view for lining the forks.

(10) Before being lifted, the load should be tilted back and the forks should be raised approximately 10 to 15 cm (4-6 inches) to clear any objects on the floor or ground. When not carrying a load, the lift shall be at least 5 cm (2 inches) off the floor or ground. The load shall be stable. Occasionally the load may have to be tied down.

(11) The load should be transported cautiously.

(12) Sudden stops and acceleration around sharp corners should be avoided.

(13) The load should be kept on the upside of rough terrain and ramps. When ascending or descending grades or ramps, the lift must be operated slowly and operated with the load upgrade. Safe distance should be maintained from the edge of ramps, platforms, or elevated docks.

(14) The fork lift is designed for picking up and moving loads. The fork lift shall not be used for lifting and transporting personnel. Exception: The warehouse director may approve the use of the fork lift for employees working in a unique situation such as performing physical inventory. All safety factors must be addressed prior to approval.

(15) When the fork is to be left unattended or parked, the forks should be lowered fully, the control should be in neutral, the power should be off, and the brake should be set.

(16) Before entering trucks or trailers, dockboards must be in place and properly anchored.

(17) Spinner knobs are not allowed on the steering wheels of fork lifts.

(18) Fork lifts shall not be driven up to anyone standing in front of a wall or any fixed object.

(19) Nd person shall be allowed to stand or pass under the elevated forks of a fork lift whether loaded or empty.

(4) The fork lift will not be used for opening or closing freight doors or truck or trailer doors.

(21) If there is a load behind the load being moved, the forks should be placed only partly under the load and the load pulled out so that the forks will not damage the other freight. Then the forks can be placed all the way under the load and tilted before moving the load.

(22) The brakes shall be set on all trucks and trailers before driving a fork lift into or out of the vehicles. The flooring of trucks and trailers must be checked for breaks and weaknesses. Wheel chocks should be used at all times when driving into trailers.

(23) Stunt driving and horseplay is not permitted.

(24) Demonstrating precise, smooth, and safe operating habits helps to achieve warehouse goals and objectives.

16. SAFE PRACTICES.

A. Objectives. The objective is for employees to follow good safe practices in performing their job, ensuring work areas are kept free of hazards.

(1) Provide a framework or logic for warehouse work rules that can be used as a guideline and checklist by warehouse personnel.

(2) Create and maintain an environment in which employees can work in an efficient, orderly, cooperative manner, and with minimal risk of injury.

(3) Develop a set of work rules to use in guiding an employee's conduct and behavior while at work. Rules may require modifications to reflect an individual warehouse environment.

R. Safe Working Methods,

(1) Illumination.

a. Adequate lighting levels of exterior gates, parking areas, truck yard, and exterior building doors prevents accidents and deters theft and attacks on personnel.

b. Exterior lighting is most effective when pointed down, at an angle and slightly away from the area requiring illumination.

c. Adequate lighting in the general office area prevents eye strain.

(2) Fences.

a. Adequate fencing prevents unauthorized access onto the warehouse property.

b. Razor ribbon is more imposing and harder to compromise. However, when using potentially dangerous fencing of this variety, warning signs must be conspicuously posted on the outside of the fence.

(3) Shelving/Racks Areas. Heavy and bulky supplies shall be stored *on* a pallet and placed within the lower tier of the storage area.

(4) Firearms.

a. With the exception of members of law enforcement agencies of municipal, county, tribal, State, and Federal Government visiting the warehouse, no person on or entering the warehouse will be permitted to retain in their possession any guns, weapons, ammunitions, explosives or incendiary devices.

b. Any item classified as a potentially dangerous weapon, for which a reasonable purpose for possession cannot be established, is similarly prohibited.

C. Privately owned firearm, guns, weapons, and dangerous weapons will be surrendered to the warehouse director, or the designated representative, for safekeeping and storage.

(5) Avoid loose clothing, necklaces, rings, etc. when operating equipment.

(6) Avoid practical jokes and rough play in work areas.

(7) A quiet environment allows employees in a hazardous area to hear warnings. Unnecessary noise should be avoided., Headphones will not be worn in the warehouse.

(8) No smoking in the warehouse.

(9) Video Display Terminal (VDT).

a. It is important to minimize video screen glare. If the lights are too bright the screen may be moved or treated with anti-glare materials.

b. The screen should be slightly below eye level.

c. The lower back should be supported.

d. A foot rest should be used, if feet cannot rest comfortably *on* the floor.

e. The back of the knees should be slightly above the seat of the chair.

f. Adjusting the document folder so that it is the same height and distance as the screen, prevents the need to refocus when looking from one to the other.,

g. The upper arm and forearm should be kept at a right angle while typing, to prevent fatigue.

h. Employees operating VDTs may purchase special prescription bifocal lenses that can be reimbursed up to *$150* with certain requirements contained in Special General Memorandum (SGM) 93-l. These glasses will relieve eye strain and fatigue. For further information on reimbursement and the IHS policy see SGM 93-1, entitled "Eyeglass Program for Video Display Terminal User Who Wear Special Application Eyeqlasses."

i. The terminal must be plugged into a wall socket that accepts all three prongs of the plug.

References: Lockout/tagout Procedures, CFR 29 1910.147.
Program for confined Spaces, CFR 29 1910.146:

17. Effective Date. This circular becomes effective upon date of signature.

**Michael H. Trujillo,** M.D., M.P.H.
Assistant Surgeon General
Director, Indian Health Service

IHS Circular Exhibit 95-l-A

# SAFETY COMMITTEE AUDIT

| | YES | NO |
|---|---|---|
| 1. Committee Structure And Operation. | | |
| A. Does a safety committee exist? | | |
| B. Does the committee meet regularly? | | |
| c. Are specific safety goals established and reviewed annually? | | |
| D. Does the safety committee meeting agenda assure that objectives are achieved? | | |
| E. Is there documentation of safety training being provided *on* a regular bases? | | |
| F. Are frequent inspections conducted to evaluate all aspects of the warehouse and its operation? | | |
| G. Are general staff meetings being held to promote safety? | | |
| H. Is a safety bulletin board available and maintained? . | | |
| I. Are written records of safety performance and accidents maintained? | | |
| J. Does the safety committee pay special attention to recurring accidents and types of injuries? | | |
| K. Do employees participate in helping to identify risks, assess the need of safety equipment and environment, and recommend solutions to the problems? | | |
| L. Is there an incentive and recognition program established for employees who have outstanding safety records? | | |

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| | YES | NO |
|---|---|---|
| 2. Incident Investigation. | | |
| A. Is every incident investigated? | | |
| B. Is the investigation conducted on a timely basis? | | |
| C. Are the proper questions (who, what, when, where, and why} asked? | | |
| D. Are incident forms properly completed and distributed? | | |
| 3. Record keeping. | | |
| A. Is all safety training documented? | | |
| B. Are Material Safety Data Sheets (MSDS) on file for each item requiring an MSDS? | | |
| (1) Is there a record that a copy of the MSDS was distributed to each health facility? | | |
| (2) Is there a book or binder with MSDS located in the vehicle used for transporting supplies and equipment? | | |
| C. Has appropriate action been initiated for equipment identified as a problem? | | |
| D. Are injury records maintained for at least 3 years? | | |

COMMENTS: Each "no" answer requires an explanatory comment and plan for corrective action.

**IHS Circular Exhibit 95-l-B**

# EMERGENCY RESPONSE PLAN - AUDIT

| | YES | NO |
|---|---|---|
| **1.** Is there a written Emergency Response Plan (ERP)? | | |
| **2.** Is the ERP reviewed annually and revised appropriately? | | |
| **3.** Are employees being oriented to ERP? | | |
| **4:** Were all the potential disasters and other emergencies to which the warehouse may be exposed included in the plan? | | |
| **5.** Is there a team member in charge of: | | |
| A. Utility shutdown procedures? | | |
| B. Security? | | |
| c. Emergency supplies and equipment? | | |
| D. Off-site Emergency Responders? | | |
| **6.** Is there a contract with local off-site emergency responders? | | |
| **7.** Have off-site responders been given the specifics of the building to assist them with their efforts such as: building location, floor plan, access route, and security risks? | | |
| **8.** Does the response team have simulated emergency drills as frequently as required by policy? | | |

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| | YES | NO |
|---|---|---|
| 9. Were the following appropriately carried out during the emergency response or emergency response drill? | | |
| A. Evacuation procedures? | | |
| B. Communication procedures? | | |
| c. Security measures? | | |
| D. Emergency supplies and equipment? | | |
| E. Utility shutdown procedures? | | |

COMMENTS: Each "no" answer requires an explanatory comment and plan for corrective action.

# WAREHOUSE SELF-INSPECTION

| | Yes | No |
|---|---|---|
| 1. Interior: | | |
| A. Is there documentation of regular building inspections? | | |
| B. Are employees reporting potential safety hazards promptly? | | |
| c. Are hazardous areas clearly marked and checked regularly? | | |
| D. Are exits clearly marked, lighted and easily accessible? | | |
| E. Are walking and working surfaces maintained in a clean, dry, non-slip condition? | | |
| F. Are railings in place on platforms four feet or higher? | | |
| G. Are the floor-wall junctures and floor joints properly sealed? | | |
| H. Do fire extinguisher meet local codes? | | |
| I. Is proper lighting installed in all areas of the facility? | | |
| J. Are there provisions for emergency lighting in the event of a power outage? | | |
| 2. Electrical: | | |
| A. Do electrical installations comply with proper electrical codes? | | |
| B. Are all switches properly marked indicating their purpose? | | |
| C. Are main disconnects identified and accessible? | | |
| D. Are wires or electrical boxes properly insulated or covered? | | |

| | Yes | No |
|---|---|---|
| E. Is all machinery properly grounded? | | |
| 3. Stairs: | | |
| A. Are stairways properly maintained? | | |
| B. Are stairways equipped with handrails? | | |
| C. Are stair surfaces skid-resistant? | | |
| D. Are defective stairs and handrail repaired immediately? | | |
| E. Is there an elevator or provision made for handicapped persons to reach the top of the stairway? | | |
| 4. Sians: | | |
| A. Are signs posted where required? | | |
| 8. Are warning signs visible where posted? | | |
| 5. pousekeewing: | | |
| A. Are work areas clean and orderly? | | |
| B. Are floors free from slipping and tripping hazards? | | |
| c. Are aisles, passageways, and fire extinguishers kept clear? | | |
| D. Is waste, scrap, tools, and unused equipment routinely removed? | | |
| E. Do trash cans have covers? | | |
| F. Are employees trained in housekeeping responsibilities? | | |

| | Yes | No |
|---|---|---|
| **6.** Exterjor: | | |
| A. Are security and warning lights properly maintained? | | |
| B. Are there parking spaces for employees and GSA vehicles? | | |
| C. Are all paved areas in good condition? | | |
| D. Are there any equipment or pallets stored outside within 300 m (10 feet) of the building? | | |
| **7.** Material Handling: | | |
| A. Are pallets inspected on a regular basis? | | |
| B. Is there a method of dealing with damaged pallets? | | |
| C. Are shelving racks adequate for the type of product stored? | | |
| D. Will shelving withstand load being placed by a pallet of supplies/equipments? | | |
| E. Are aisles wide enough to accommodate servicing shelves? | | |
| F. Are materials stored in their proper designated areas only? | | |
| G. Are all stocks straight (not leaning)? | | |
| H. Are materials stocked to prevent sliding or collapse? | | |
| I. Are materials kept from within 45 cm (18 inches) of the sprinkler heads? | | |
| J. Are all products in the stacks free of damage? | | |
| K. Are damaged products immediately isolated and repackaged? | | |

| | Yes | No |
|---|---|---|
| L. Are pallet loads of case goods secured with string, shrink-wrap, netting, or other means to restrict sliding or falling Cartoons? | | |
| M, Are any products Stored in aisles? | | |
| N. Are materials stored so that they do not block exits, fire extinguishers, and emergency equipment? | | |
| 0. 16 employee training in proper lifting and handling techniques documented? | | |
| 8. Personal Protective Equipment (PPE): | | |
| A. Is appropriate PPE available to all employees working in hazardous areas and/or 'designated areas? | | |
| B. Are employees wearing the required PPE? | | |
| c. Is appropriate PPE available to all visitors? | | |
| D. Are there local guideline6 regarding the use of PPE? | | |
| 9. Driver Safetv: | | |
| A. Is there documentation of training for all employees who operate powered lift equipment? | | |
| B. Are safety guidelines posted in the warehouse where they can be seen clearly by drivers? | | |
| c. Is there documentation of personnel training for emergencies? | | |
| D. Is their documentation that equipment failures/defects are reported immediately? | | |
| E. Is all repair and maintenance work documented? | | |

| | Yes | No |
|---|---|---|
| 10. Band And Power Tools: | | |
| A. Are there specific rules established regarding proper use of tools? | | |
| B. Is there a method to enforce proper use of tools? | | |
| C. Do only authorized personnel repair tools? | | |
| D. Do employees wear proper protective clothing while working hand and power tools? | | |
| 11. Batteries: | | |
| A. Is there documentation of employee training in the safety aspects of battery charging? | | |
| B. Are battery recharging areas marked? | | |
| C. Can electrolyte be neutralized and flushed from the area? | | |
| D. Are tools and other metallic objects kept away from the top of batteries? | | |
| E. Is protective clothing worn by employees while servicing and charging batteries? | | |
| F; Are showers and eye wash available in case of an electrolyte or acid spill? | | |
| 12. Docks: | | |
| A. Is there a Vehicle Restraint System (VRS) to securely lock trailers into place at the dock? | | |
| B. Does the VRS accommodate all types of trailers? | | |
| C. Are the warehouse workers trained in the proper use of VRS? | | |
| D. Are all trailer wheels chocked? | | |
| E. Are adequate chocks available to handle the daily workload? | | |

| | | Yes | NO |
|---|---|---|---|
| F. | IS the dock approach well drained and **free of** potholes? | | |
| G. | Are there stairs leading, from the dock to the driveway? | | |
| H. | Are the doors at least 270 m and 15 cm (9 ft. 6 inches) wide and 300 m (10 ft.) high in, order to service larger trailers? | | |
| I. | **Do dock bumpers extend far enough down the dock face to keep even the lowest trailers from striking** and damaging the building wall? | | |
| **J.** | **is there documentation that employees have,** been trained in the use of dock plates? | | |
| **K.** | Are dock plates adequate for the load placed on them? | | |
| L. | **Are dock plates kept clean of oil, grease, water, ice, and snow?** | | |

**COMMENTS:** **Each "no" answer requires an explanatory comment and plan for corrective action.**